

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Public Safety and Homeland Security Bureau)	
Seeks Comment on Petition for Waiver of)	RM-11433
Rules Filed by the State of Maryland)	
Requesting Permission to Operate Air-to-)	
Ground Radio Equipment on 700 MHz)	
Secondary Trunking Channels)	

**COMMENTS OF
THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these Comments in response to the Commission Public Notice in the above-captioned proceeding.¹ In these comments, NPSTC supports the petition for waiver submitted by the State of Maryland. The petition seeks to use 700 MHz band secondary trunking channels for public safety air-to-ground communications. Use of these particular channels should help address Maryland's operational requirement while avoiding interference to other neighboring public safety operations. The State of Maryland request is also consistent with a Petition for Rulemaking NPSTC previously submitted to the Commission that seeks to address the same operational requirement.² Accordingly, NPSTC supports a Commission grant of the waiver as requested by the State of Maryland and encourages the Commission also to move forward with the NPSTC petition.

¹ Public Notice: Public Safety and Homeland Security Bureau Seeks Comment on Petition for Waiver of Rules Filed by the State of Maryland Requesting Permission to Operate Air-to-Ground Radio Equipment on 700 MHz Secondary Trunking Channels, DA 12-602, released April 17, 2012.

² Petition for Rulemaking: National Public Safety Telecommunications Council Petition for Rulemaking to Allow Aircraft Voice Operation on Certain Interoperability Channels, WT-Docket No. 96-86, submitted March 19, 2010. The Commission subsequently placed this petition on Public Notice assigning rulemaking number RM-11433 and requesting comments. See Public Notice, DA-11-1146 released June 30, 2011.

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 15 organizations participate in NPSTC:

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Emergency Number Association
- National Sheriffs' Association

Several federal agencies are liaison members of NPSTC. These include the Department of

Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office of Interoperability and Compatibility, and the SAFECOM Program; Department of Commerce (National Telecommunications and Information Administration); Department of the Interior; and the Department of Justice (National Institute of Justice, CommTech Program). NPSTC has liaison relationships with associate members, the Telecommunications Industry Association, the Canadian Interoperability Technology Interest Group, the National Council of Statewide Interoperability Coordinators and the Utilities Telecom Council.

NPSTC Comments

The Commission recently released a Public Notice requesting comment on the Petition for Waiver filed by the State of Maryland, which seeks use of certain channels in the 700 MHz public safety narrowband spectrum block for airborne operations. These channels would be used to provide essential communications for state aircraft involved primarily in police and emergency medical operations. Availability of the requested 700 MHz band channels would also integrate these public safety airborne operations into the Maryland FiRST 700 MHz interoperable radio network being deployed to link local government first responders into a cohesive and interoperable public safety communications network.

NPSTC agrees a grant of the request for waiver would help Maryland meet important public safety communications requirements, thereby enabling improved service to the public. We believe the State of Maryland Petition for Waiver sets forth the benefit such airborne communications provide to public safety and the general public, the rationale for seeking use of these particular channels, and the lack of any harm a grant of the waiver would cause to others in public safety. NPSTC views those arguments already to be very well-stated on the record and therefore will not repeat them in these comments.

In addition to supporting an expeditious grant of the waiver as Maryland requests, NPSTC also urges the Commission to move forward with the NPSTC Petition for Rulemaking which seeks essentially the same positive results for the entire public safety community.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ralph A. Haller", written in black ink.

Ralph A. Haller, Chairman

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